

The undersigned counsel for Plaintiffs World Trade Center Properties LLC, 1
World Trade Center LLC, 3 World Trade Center LLC, and 7 World Trade Company L.P.
(collectively, "WTCP Plaintiffs"), and Defendants American Airlines, Inc.; AMR
Corporation; United Air Lines, Inc.; United Continental Holdings, Inc. (f/k/a UAL
Corporation); US Airways, Inc.; US Airways Group, Inc.; Colgan Air, Inc.; Globe
Aviation Services Corporation; Huntleigh USA Corporation; The Boeing Company; and
Massachusetts Port Authority; Delta Air Lines, Inc.; and Continental Airlines, Inc.
(collectively, "the Aviation Defendants") HEREBY STIPULATE AND AGREE to the
following schedule regarding 7 WTC damages discovery:

- 7 WTC will complete or acknowledge the completion of its production of documents in response to the Aviation Defendants' Request for Production of Documents to WTC 7 by December 5, 2012.
- 2. The deposition of the 7 WTC FRCP 30(b)(6) witness shall take place on January 5, 2012.

- 3. The close of fact discovery on the issue of Plaintiffs' recoverable damages for 7 WTC shall be January 16, 2012. However, the Aviation Defendants may request the production of documents identified at the 7 WTC deposition on or before this date, and Plaintiffs shall respond in accordance with Fed. R. Civ. P. 34(b).
  - 4. Plaintiffs' expert reports shall be served on or before February 6, 2012.
  - 5. Defendants' expert reports shall be served on or before March 19, 2012.
  - 6. Expert depositions shall be completed on or before April 30, 2012.

Dated: New York, New York November 14, 2011

<b>FLEMMING</b>	<b>ZULACK</b>	WILLIAMSON
<b>ZAUDERER</b>	LLP	

CONDON & FORSYTH LLP

Ву:	_/s/	By:/s/	
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Aviation Defendants' Liaison Counsel

SO ORDERED:

IN K. HELLERSTEIN

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